

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAY REYNOLDS,

Plaintiff,

- against -

HEARST COMMUNICATIONS, INC.

Defendant.

Docket No. 17-cv-06720 (DLC)

DECLARATION NO. 2 OF RAY REYNOLDS

RAY REYNOLDS, under the penalty of perjury, declares:

1. I am the plaintiff in this copyright infringement lawsuit and submit this declaration in further support of my opposition to Defendant Hearst Communications, Inc.'s motion for a bond under L.R. 54.2.

2. It has been reported that roughly eighty percent (80%) of Americans live paycheck-to-paycheck. Attached as Exhibit A is a true and correct copy of a recent CBS News article, published September 25, 2017, reporting that 80% of Americans live paycheck-to-paycheck.

3. As a working-class photographer and building contractor, I fall within that eighty percentile of Americans who live paycheck-to-paycheck. While I am not insolvent, I do attest that I am impecunious.

4. Because whatever cash assets I have available must be used to finance my on-going living expenses and to purchase construction materials, I do not have the financial capacity to comply with a Court Order to post security in this case.

5. I currently maintain two bank accounts: (1) Rayzors Edge Photography LLC d/b/a DJT.Digital; and (2) Ray P Reynolds d/b/a Ray Reynolds Construction.

6. The ending balance for my “Rayzors Edge Photography LLC” account for the months October-December 2017 were as follows: \$653.87 (10/31/17); \$450.17 (11/30/17); \$453.29 (12/29/17). Attached as Exhibit B are true and correct copies of my bank statements for my “Rayzors Edge Photography LLC” account for the months October-December 2017.

7. The ending balances for my “Ray P Reynolds dba Ray Reynolds Construction” account for the months October-December 2017 were as follows: \$1,603.17 (10/31/17); \$4,124.02 (11/30/17); \$7,953.34 (12/31//17). The ending balance for December 2017 has already been expended to purchase construction materials for this month’s projects. Attached as Exhibit C are true and correct copies of my bank statements for my “Ray P Reynolds dba Ray Reynolds Construction” account for the months October-December 2017.

Dated: January 12, 2018
Collinsville, Virginia

I swear under the penalty of perjury that the foregoing statements are true and correct to the best of my personal knowledge.

Ray Reynolds

Ray Reynolds (the plaintiff)